

US FEDERAL COURT

PLAINTIFF DEMANDS TRIAL BY JURY  
DISTRICT OF RHODE ISLAND

**ANDREW SANTIAGO**  
*Plaintiff,*

v.

C.A. No. \_\_\_\_\_

**Centerline Communications, LLC**  
**Paul Chace**  
**EAN Holdings LLC**  
*Defendant,*

## **COMPLAINT**

### **PARTIES**

1. Andrew Santiago (hereinafter “Plaintiff”) is a resident of the State of Rhode Island, County of Providence, City of Woonsocket.
2. Paul Chace (hereinafter “Defendant”), upon information and belief, is a resident of the State of Massachusetts.
3. Centerline Communications LLC, (hereinafter “Defendant”), upon information and belief is a Foreign Massachusetts limited liability company located at 750 West Center Street West Bridgewater MA 02379, with a headquarters in Vermont.
4. EAN Holdings LLC, (hereinafter “Defendant”), upon information and belief is a Oklahoma limited liability entity with an address of 14002 E 21<sup>st</sup> Street, Tulsa.

### **JURISDICTION**

5. This Court has jurisdiction pursuant to Diversity Title 28, Section 1332, as the amount in controversy exceeds Seventy-Five Thousand Dollars.
6. The Plaintiff resides in the State of Rhode Island.
7. The Defendant Paul Chace is a Massachusetts Resident.
8. The Defendant Centerline Communications, LLC is a Foreign Limited Liability Company Located in Massachusetts.
9. The Defendant EAN Holdings, LLC is an entity located in Tulsa Oklahoma.

### **BACKGROUND**

10. On April 25, 2020 during the height of the Covid-19 pandemic with the world shut down, Mr. Santiago along with other motorcycles went out to do drive by birthday wishes to young children that were not able to celebrate their birthday with friends and families due to the pandemic.
11. After driving by several homes, Mr. Santiago turned onto Main Road in Westport to go home.
12. Upon information and belief, Centerline Communications, Paul Chace, and EAN

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Holdings, insured, owned and or leased or rented the Trailer and Truck operated by Paul Chace that collided with the Plaintiff Andrew Santiago.

**COUNT I- NEGLIGENCE**

13. On or about April 25, 2020, Plaintiff was the operator of a certain motorcycle, traveling northbound on Main Road in Westport.
14. On or about April 25, 2020, Defendant was the Operator of a 2020 White Ford F-250 bearing plate MA 9GF522 and pulling a Trailer with registration MA A95747 was traveling southbound.
15. At said time and place, Defendant, Paul Chace negligently operated said automobile, causing the Defendant's automobile to collide with Plaintiff's motorcycle.
16. Paul Chace took a left without using a directional causing Andrew Santiago to collide with Paul Chace's vehicles.
17. Andrew Santiago was operating his motorcycle with all due cation and care and was not speeding and in no way contributed to the unfortunate accident.
18. As a direct or proximate result of Defendant's negligence the Plaintiff was caused physical injuries, lost income potential, pain and suffering, property damage, and emotional distress, requiring medical care and treatment, and the incurrence of medical expenses, rental car charges, and they were otherwise injured and damnified.
19. The amount in controversy is sufficient to satisfy the jurisdiction of this Honorable Court.

WHEREFORE, Plaintiff request entry of Judgment in their favor against Defendant, in an amount to fairly and fully compensate them for in a sum sufficient to compensate them fully for injuries and losses flowing from the collision with the Defendant, compensating them fully for all their damages, and related expenses, together with interest, and costs, and punitive damages, and Attorney's fees and such further relief as this Honorable Court may deem fair and just.

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**COUNT II- EQUITY**

20. Paragraphs 1 through 189 are incorporated herein by reference as if fully set forth again here.
21. Plaintiff incurred medical expenses, in the amount of One Hundred Seventy Thousand, Two Hundred Eighteen Dollars and 32/100 (\$170,218.32) plus interest. In addition to Property Damage in the amount of Nineteen Thousand Eight Hundred Fifteen Dollars

PLAINTIFF DEMANDS TRIAL BY JURY and 90/100, (\$19,815.90) plus interest. Therefore, said Plaintiff seeks equitable indemnity from the Defendants as they were the owner and operator of the vehicle whose negligence was the proximate cause of the alleged injuries and damages of Plaintiff.

WHEREFORE, Plaintiff hereby demands judgment for equity and/or contribution from the Defendant, in the amount of ONE HUNDRED NINETY THOUSAND AND THIRTY FOUR DOLLARS and 22/100 (\$190,034.22).

Respectfully Submitted,  
Plaintiff,  
By and through their Attorney,

Lawrence P Almagno Jr.

/s/Lawrence P. Almagno Jr.  
Lawrence P Almagno Jr. (Bar No. 9185)  
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